

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 268

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 21, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ First Omnibus Motion for Entry of an Order Authorizing the Debtors to (I) Reject Certain Unexpired Leases Effective as of the Rejection Date and (II) Abandon Personal Property, if any, Associated Therewith* [D.I. 268] (the “Motion”).

2. On January 9, 2023, the Court entered the *Order Approving Stipulation Between the Debtors and 1450 Brickell, LLC* [D.I. 430] and the *Order Approving Stipulation Between the Debtors and Brickell Owner LLC* [D.I. 431] (collectively, the “Brickell Orders”), resolving the Motion with respect to rejection of certain of the Debtors’ leases with 1450 Brickell, LLC and Brickell Owner LLC.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. On January 10, 2023, the Court entered the *Order Approving Stipulation Between the Debtors and the Metropolitan Square Associates LLC* [D.I. 455] (the “Metropolitan Square Order” and together with the Brickell Orders, the “Stipulation Orders”), resolving the Motion with respect to rejection of the Debtor West Realm Shires Inc. lease with The Metropolitan Square Associates LLC.

4. As of the date hereof, no formal objection or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order filed with the Motion from 101 Second Street, Inc.

5. The Debtors have revised the proposed form of order (the “Revised Order”) to remove those leases that have been resolved by the Stipulation Orders and to resolve the Informal Comments, a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed order attached to the Motion is attached hereto as **Exhibit B**.

6. The Revised Order has been circulated to the Office of the United States Trustee, the Official Committee of Unsecured Creditors and counsel for 101 Second Street, Inc. (collectively, the “Parties”). The Parties have advised that they do not object to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 10, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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